

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re	:	Chapter 11
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AIO US, INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 24–11836 (CTG)
	:	
Debtors.	:	(Joint Administration Requested)
	:	
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NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED  
DOCUMENTS AND (II) AGENDA FOR HEARING ON FIRST DAY MOTIONS  
SCHEDULED FOR AUGUST 14, 2024 AT 10:00 A.M. (ET), BEFORE THE  
HONORABLE CRAIG T. GOLDBLATT, AT THE UNITED STATES  
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE<sup>2</sup>

This proceeding will be conducted remotely via Zoom. Please refer to Judge Goldblatt’s Chambers Procedures (<https://www.deb.uscourts.gov/judge-craig-t-goldblatt>) and the Court’s website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Goldblatt’s expectations of remote participants, and the advance registration requirements.

**Registration is required by one (1) hour prior to the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court’s website.**

PLEASE TAKE NOTICE that on August 12, 2024, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the following voluntary petitions (collectively, the “**Petitions**”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

A. Voluntary Petitions:

1. [AIO US, Inc.](#)

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: AIO US, Inc. (9872), Avon Products, Inc. (4597), MI Holdings, Inc. (6450), and Avon Capital Corporation (2219). The Debtors’ mailing and service address is 4 International Drive Suite 100, Rye Brook, New York 10153.

<sup>2</sup> All motions and other pleadings referenced herein are available online at the following address: <https://dm.epiq11.com/case/aiousinc/info>.

2. [Avon Products, Inc.](#)
3. [MI Holdings, Inc.](#)
4. [Avon Capital Corporation](#)

PLEASE TAKE FURTHER NOTICE that in addition to the Petitions, the Debtors have filed the following first day motions and related documents (collectively, the “**First Day Motions**”):

B. First Day Declaration:

5. Declaration of Philip J. Gund in Support of Debtors’ Chapter 11 Petitions and First Day Pleadings [[Docket No. 12](#) – filed August 13, 2024]

C. First Day Motions:

6. Motion of Debtors Pursuant to Fed. R. Bankr. P. 1015(b) for Entry of Order Directing Joint Administration of Related Chapter 11 Cases [[Docket No. 2](#) – filed August 12, 2024]
7. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 345, 363, 364, 503, and 541 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue Existing Cash Management Systems, Bank Accounts, and Business Forms, (B) Implement Ordinary Course Changes to Cash Management System, and (C) Honor Certain Related Prepetition Obligations, (II) Authorizing Continuation of Intercompany Transactions and Granting Administrative Expense Status for Postpetition Intercompany Claims, (III) Waiving Certain Requirements with Respect to the Debtors’ Accounts, and (IV) Granting Related Relief [[Docket No. 9](#) – filed August 13, 2024]
8. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507(a) and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Reimbursable Expenses, and Other Obligations on Account of Compensation and Benefits Programs and (B) Continue Compensation and Benefits Programs in the Ordinary Course, and (II) Granting Related Relief [[Docket No. 8](#) – filed August 13, 2024]
9. Debtors’ Application Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. §§ 503 and 1107, and Fed. R. Bankr. P. 2002(f) for Entry of an Order (I) Authorizing and Approving the Appointment of Epiq Corporate Restructuring, LLC as Claims and Noticing Agent and (II) Granting Related Relief [[Docket No. 3](#) – filed August 12, 2024]
10. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 362(d), 363(b), and 363(c) and Fed. R. Bankr. P. 4001 for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Their Insurance Policies, Surety Bond Program, and Letters of Credit, and (B) Honor All Insurance, Surety Bond, and Letters of Credit Obligations, (II) Modifying Automatic Stay, and (III) Granting Related Relief [[Docket No. 7](#) – filed August 13, 2024]

11. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 507(a) for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Taxes and Assessments, and (II) Granting Related Relief [[Docket No. 5](#) – filed August 12, 2024]
12. Motion of Debtors Pursuant to 11 U.S.C. §§ 105 and 107 and Fed. R. Bankr. P. 1007, 2002, and 9007 for Entry of Order (I) Authorizing Debtors to Redact Certain Personal Identification Information, (II) Authorizing Debtors to File Certain Top Creditor Lists, (III) Approving Special Noticing Procedures for Talc Claimants, and (IV) Granting Related Relief [[Docket No. 4](#)– filed August 12, 2024]
13. Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 for (I) Authority to (A) Obtain Postpetition Financing, (B) Grant Liens and Provide Superpriority Administrative Expense Status (C) Grant Adequate Protection, (D) Modify the Automatic Stay, and (E) Schedule a Final Hearing and (II) Related Relief [[Docket No. 10](#) – filed August 13, 2024]
  - i. Declaration of Marcelo Messer in Support of Motion of Debtors Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 507, and 552 and Fed. R. Bankr. P. 2002, 4001, 6003, 6004, and 9014 for (I) Authority to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Liens and Provide Superpriority Administrative Expense Status, (D) Grant Adequate Protection, (E) Modify the Automatic Stay, and (F) Schedule A Final Hearing and (II) Granting Related Relief [[Docket No. 11](#) – filed August 13, 2024]

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the First Day Motions is scheduled for August 14, 2024 at 10:00 a.m. (prevailing Eastern Time) before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware (the “**First Day Hearing**”). Parties who wish to participate in the First Day Hearing may do so by registering for the Zoom hearing at: <http://www.deb.uscourts.gov/ecourt-appearances>.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

Dated: August 13, 2024  
Wilmington, Delaware

/s/ Zachary I. Shapiro

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